

# Exhibit 3

**KAPLAN RICE LLP**  
 142 West 57th Street, Suite 4A  
 New York, NY 10019  
 (212) 235-0300

October 9, 2020

Michael Principe  
 GSE Worldwide  
 1500 Broadway  
 New York, NY 10036

Invoice# 2999 HJK  
 Our file# 60276 0013  
 Billing through 08/31/2020

Re: Scoffield Post Award Proceedings

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PROFESSIONAL SERVICES

Hours

Amount

Kaplan, Howard J.	17.60	\$19,360.00
Boken, Anne	4.20	\$1,365.00
Eggenberger, Michael K	49.90	\$22,455.00
Roy, Chandni	38.10	\$11,430.00
Irizarry, Gabriel	6.30	\$1,323.00
Total Services		<u>55,933.00</u>

Court Database		30.80
Lexis Research		20.17
Westlaw Research		<u>1,168.51</u>
Total Disbursements		1,219.48

Billing Summary

Total professional services	\$55,933.00	
Total expenses incurred	\$1,219.48	
Courtesy Discount	\$8,389.95	CR

Total of new charges for this invoice

\$48,762.53

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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Detail of Fees Billed

08/01/2020	HJK	Outline brief.	1.20 hrs.	1,320.00
08/02/2020	HJK	Emails re: research.	0.70 hrs.	770.00
08/02/2020	CR	Research; Review outline for opposition brief.	5.30 hrs.	1,590.00
08/02/2020	MKE	Review cross-petition to vacate arbitration award; review case law cited therein; perform legal research on Section 301 preemption.	4.50 hrs.	2,025.00
08/03/2020	HJK	Emails re: motion to vacate.	0.80 hrs.	880.00
08/03/2020	CR	Draft opposition brief including research.	3.50 hrs.	1,050.00
08/03/2020	MKE	Review case law cited by Respondents in their motion to vacate arbitration award; draft chart comparing same; draft email summaries of legal research for same.	5.70 hrs.	2,565.00
08/04/2020	CR	Draft opposition brief including research.	3.80 hrs.	1,140.00
08/04/2020	MKE	Speak with C. Roy re [REDACTED] [REDACTED] draft legal arguments for same; perform legal research for same.	3.10 hrs.	1,395.00
08/05/2020	CR	Draft opposition brief including research.	2.00 hrs.	600.00
08/05/2020	MKE	Speak with H. Kaplan and C. Roy [REDACTED] [REDACTED] draft legal arguments for same; perform legal research for same.	4.30 hrs.	1,935.00
08/06/2020	HJK	[REDACTED]	2.50 hrs.	2,750.00
08/06/2020	MKE	Draft legal arguments for response/reply brief to confirm arbitration award.	7.20 hrs.	3,240.00
08/07/2020	HJK	Letter re: Amicus.	0.50 hrs.	550.00
08/07/2020	GI	Review and SDNY ECF file letter to judge.	0.50 hrs.	105.00
08/07/2020	CR	Draft opposition brief including research.	4.20 hrs.	1,260.00
08/07/2020	MKE	Edit legal arguments for response/reply brief to confirm arbitration award; edit joint letter to court re sealing procedures.	3.10 hrs.	1,395.00
08/09/2020	HJK	Revise brief; read 301 cases.	3.50 hrs.	3,850.00
08/09/2020	MKE	Perform legal research [REDACTED] [REDACTED] prepare summary of same.	1.80 hrs.	810.00
08/10/2020	HJK	Revise brief; review research; emails.	1.70 hrs.	1,870.00
08/10/2020	CR	Draft opposition brief including research.	2.70 hrs.	810.00
08/10/2020	GI	Research NY e-filing protocols for request to seal documents.	0.50 hrs.	105.00
08/10/2020	MKE	Perform legal research [REDACTED]; perform legal research [REDACTED]	4.10 hrs.	1,845.00

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		[REDACTED]; draft summary of same; propose edits to brief re same.		
08/11/2020	CR	Research for opposition brief including for motion to seal in SDNY and NYS supreme; E-mail to Reade and Kaiser re motion to seal; teleconference with H.K. and M.E.	4.80 hrs.	1,440.00
08/11/2020	GI	Review docket and download recent filings for review; retrieve, organize and print cases for review utilizing west law.	0.70 hrs.	147.00
08/11/2020	MKE	Perform legal research [REDACTED] [REDACTED] draft legal arguments for brief ISO petition to confirm arbitration award.	3.80 hrs.	1,710.00
08/12/2020	HJK	Comments on brief; review amicus order.	1.40 hrs.	1,540.00
08/12/2020	GI	Review docket and calendar schedule.	0.40 hrs.	84.00
08/12/2020	MKE	Draft legal arguments for response/reply brief for petition to confirm arbitration award; review Respondents' arbitration filings for same.	3.10 hrs.	1,395.00
08/13/2020	AB	Legal research re: [REDACTED] [REDACTED] [REDACTED]	4.20 hrs.	1,365.00
08/13/2020	HJK	Revise brief; research; emails and telecons.	1.50 hrs.	1,650.00
08/13/2020	CR	Research re substantial performance; Edits to opposition brief including additional research; Redlined Kaiser's draft of letter to seal; Emails.	4.60 hrs.	1,380.00
08/13/2020	MKE	Draft/edit the response/reply brief for petition to confirm arbitration award; speak with H. Kaplan and C. Roy re same; perform legal research for same.	3.80 hrs.	1,710.00
08/14/2020	GI	Review, organize and SDNY ECF file Opposition to cross petition.	1.40 hrs.	294.00
08/14/2020	HJK	Revise brief; revise motion to seal.	2.00 hrs.	2,200.00
08/14/2020	CR	Draft letter to Judge Koeltl for additional words; Draft and edit opposition brief and supporting documents and preparation for filing; Reviewed MLBPA letter requesting to seal; Edited Kaiser's draft letter; Emails.	2.50 hrs.	750.00
08/14/2020	MKE	Edit response/reply brief for petition to confirm arbitration award; speak with H. Kaplan re same; review procedures for filing under seal for same; review Kaplan Declaration and exhibits for same.	2.80 hrs.	1,260.00

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08/16/2020	HJK	Emails re: sealing request.	0.30 hrs.	330.00
08/16/2020	CR	Emails; Reviewed filed brief for typographical errors.	0.90 hrs.	270.00
08/17/2020	GI	Review, organize & SDNY ECF file amended brief and letter to Judge Koeltl.	0.80 hrs.	168.00
08/19/2020	CR	Emails.	0.10 hrs.	30.00
08/21/2020	HJK	Correspondence re: MLBPA amicus brief.	0.30 hrs.	330.00
08/21/2020	MKE	Perform legal research on time to respond to amicus briefs.	0.60 hrs.	270.00
08/22/2020	HJK	Read MLBPA brief; emails.	1.20 hrs.	1,320.00
08/22/2020	CR	Emails.	0.10 hrs.	30.00
08/23/2020	CR	Reviewed opposition brief and marked for redactions; Drafted rule 7.1 statement.	1.10 hrs.	330.00
08/23/2020	MKE	Edit proposed redactions to response/reply brief.	0.40 hrs.	180.00
08/24/2020	CR	Marked and reviewed petition for redactions; Marked and reviewed memorandum of law for redactions; Revised rule 7.1 statement including emails and filing; Reviewed draft letter to court in response to Kaiser's request to respond to amicus brief; Prepare order to show cause to seal documents in NYS supreme.	2.40 hrs.	720.00
08/24/2020	GI	Prepare and SDNY ECF file rule 7.1 Statement; Review docket and download all recent filings for review; Assist with redacting documents in preparation for filing.	1.60 hrs.	336.00
08/24/2020	MKE	Review proposed redactions; draft letter to court re reply to amicus brief.	0.50 hrs.	225.00
08/28/2020	CR	Emails.	0.10 hrs.	30.00
08/31/2020	MKE	Review respondents' reply brief; take notes on same.	1.10 hrs.	495.00
Total Services				<u>\$55,933.00</u>

Detail of Expenses Billed

08/31/2020	Court Database	21.90
08/31/2020	Court Database	8.90
08/31/2020	Lexis Research	12.28
08/31/2020	Lexis Research	7.89
08/31/2020	Westlaw Research	923.77
08/31/2020	Westlaw Research	<u>244.74</u>
Total Disbursements		\$1,219.48